

EXHIBIT D



**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

**PLAINTIFF TQ DELTA, LLC'S
OBJECTIONS TO COMMScope'S WITNESS LIST**

Plaintiff TQ Delta, LLC ("TQ Delta"), pursuant to the Court's Docket Control Order entered in this case, hereby provides its objections to Defendants CommScope Holding Company, Inc., CommScope Inc., Arris US Holdings, Inc., Arris Solutions, Inc., Arris Technology, Inc. and Arris Enterprises, LLC's ("CommScope") Witness List, including, at least, on the grounds it identifies no named individual as a will-call witness. TQ Delta reserves the right to supplement, amend, or modify these objections and its witness lists in view of and/or in response to CommScope's designations and evidence, the Court's ruling on any pretrial motions or other issues, and as TQ Delta's preparation for trial proceeds.

TQ Delta reserves the right to present deposition testimony of individuals designated by CommScope. TQ Delta reserves the right to supplement, amend, or modify its deposition testimony designations in view of and/or in response to CommScope's designations and evidence, the Court's ruling on any pretrial motions or other issues, and as TQ Delta preparation for trial proceed.

Dated: February 8, 2023

Respectfully Submitted,

/s/ William E. Davis, III

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this February 8, 2023 on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/William E. Davis, III
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